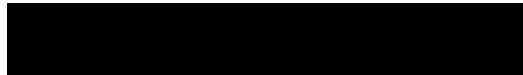


Exhibit B



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

R2 Solutions LLC,
Plaintiff,

v.

Databricks, Inc.,
Defendant.

Civil Action No. 4:23-cv-01147-ALM



DECLARATION OF CRAIG YUDELL

I, Craig Yudell, hereby declare as follows:

1. I am more than 18 years of age, and I am competent to make this Declaration. I have personal knowledge of the facts contained in this Declaration, and I am competent to testify on the matters set forth below.

2. I am President of R2 Solutions LLC. I am also Vice President of Licensing and Litigation at Acacia Research Corporation. I replaced Eric Lucas as President of R2 Solutions LLC in 2021.

3. R2 Solutions LLC is a limited liability company incorporated in Texas. Paul F. Reidy formed and incorporated R2 Solutions LLC in 2016 and served as its Managing Member.

4. R2 Solutions LLC was incorporated with a principal place of business in Austin, Texas. Mr. Reidy resided in Austin, Texas at that time, and he still resides in Austin, Texas today.

5. Mr. Reidy was the President of Excalibur IP, LLC and held that role at least as early as 2020.

6. On April 25, 2020, Acacia Research Group LLC acquired all of Mr. Reidy's ownership interest in R2 Solutions LLC, and R2 Solutions LLC has since had a place of business located at 6136 Frisco Square Blvd., Suite 400, Frisco, TX 75034, which I understand is located in the Eastern District of Texas.

7. I maintain a work address at 6136 Frisco Sq. Blvd., Suite 400, Frisco, TX 75034 and work extensively from my residence in Austin, TX.

8. On April 27, 2020, Excalibur IP, LLC entered into a patent sale agreement with R2 Solutions LLC. This acquisition included the assignment of all rights, title, and interest in, and to, a large patent portfolio (the "Excalibur Portfolio") to R2 Solutions LLC. The Excalibur Portfolio includes U.S. Patent Nos. 8,190,610 ("the '610 patent"), which I understand is the subject of litigation between R2 Solutions LLC and Databricks, Inc.

9. I understand that Excalibur IP, LLC licensed the Excalibur Portfolio to numerous companies between May 2016, when Excalibur IP, LLC acquired the patents in the Excalibur Portfolio from Yahoo!, and April 2020, when R2 Solutions LLC acquired the Excalibur Portfolio. During the period of its ownership, Excalibur IP, LLC licensed the Excalibur Portfolio to [REDACTED] among others. All of these licenses, except for [REDACTED] were negotiated and consummated without litigation. I understand that Mr. Reidy negotiated many, if not all, of these licensing agreements on behalf of Excalibur IP, LLC.

10. The '610 patent was included in the license agreements that Excalibur IP, LLC consummated.

11. Since R2 Solutions LLC acquired the Excalibur Portfolio, its business activities in the Eastern District of Texas and in Texas include management of the Excalibur Portfolio and

substantial licensing efforts, including more than twenty licenses without litigation and more than forty licenses in total. The Excalibur Portfolio currently comprises over 5,000 patents and patent applications worldwide, including over 2,000 U.S. patents. Many of the patents in the Excalibur Portfolio do not expire until the 2030s. I have spearheaded such business activities since I became President of R2 Solutions LLC.

12. On behalf of R2 Solutions LLC, I continue to work to license the Excalibur Portfolio—including the '610 patent—without the necessity of litigation. R2 Solutions' soft licensing efforts are extensive and ongoing. R2 Solutions LLC plans to continue its patent enforcement and non-litigation licensing efforts in the Eastern District of Texas and in the State of Texas.

13. I have extensive knowledge and firsthand experience with the Excalibur Portfolio, as well as the licensing of the patents therein, including the '610 patent. I also have knowledge regarding the ownership, operations, and financials of R2 Solutions LLC.

14. Substantially all, if not all, of R2 Solutions LLC's documents are stored on servers at the offices of its outside counsel in Fort Worth, Texas. Such documents include information relevant to patent prosecution, ownership, infringement, damages (such as license agreements involving the asserted patents), and validity (including various asserted prior art). No physical copies of these documents are located in California.

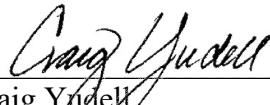
15. I expect to attend trial in the above-captioned case and willingly provide testimony.

16. Travel to the court of the Eastern District of Texas in Sherman, Texas to provide testimony would be convenient from my residence in Austin, Texas. While traveling to Sherman, Texas would require automobile travel and overnight lodging each night of the trial, holding trial

in the Northern District of California would require comparatively increased travel time, costs, and inconveniences.

I declare under penalty of perjury that the statements made in this Declaration are based on my own knowledge and that all opinions given are my own.

Dated: June 6, 2024



Craig Yudell
President, R2 Solutions LLC